

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

1 Isaias Mendosa-Larrea
A206 87 716 YOB: 1995
the United Mexican States

Principal

United States District Court
Southern District of Texas
FILED

Case Number:
M-15-0521-M

2 Nazareth Aguilar-Julian
A208 160 267 YOB: 1997
the United Mexican States

Co-Principal

APR 07 2015

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 4/06/15 in Hidalgo, Texas County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Antonio De La Cruz-Victoriano, citizen of the United Mexican States, and Fidelina Garcia-Munguia, citizen of Honduras, and seven (7) other undocumented aliens, for a total of nine (9) who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport, by foot, said aliens in furtherance of such violation of law within the United States, that is, from a location near Hidalgo, Texas to the point of arrest near Hidalgo, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On, April 6, 2015, BPA Brandon Bollinger was notified by the McAllen Border Patrol Station Tactical Operations Center of possible undocumented aliens in Hidalgo, Texas. Border Patrol Agents responded and were able to find foot sign of a group making their way north through the brush. Border Patrol Agents followed the foot sign and apprehended a total of 11 undocumented aliens.

All subjects were transported to the McAllen, Texas Border Patrol Station for processing.

At the McAllen Border Patrol Station, biometric data was taken from every member of the group and through these checks and further investigation, MENDOSA-Larrea, Isaias and AGUILAR-Julian, Nazareth were identified as the foot guides.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Approved to file Embudo for Leo
Sworn to before me and subscribed in my presence,

Andrew Johnson Senior Patrol Agent
Printed Name of Complainant

April 7, 2105
Date

at McAllen, Texas
City and State

Dorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0521-M

RE: Isaias Mendosa-Larrea

A206 87 716

CONTINUATION:

PRINCIPLE STATEMENT:

MENDOSA-Larrea, Isaias was advised of his Miranda Rights and provide a sworn statement without an attorney present.

MENDOSA readily admitted he was one of the guides in the group. He stated that he was attempting to smuggle a group of approximately 9 undocumented aliens along with the help of a female smuggler by the name of Nazareth AGUILAR-Julian. MENDOSA stated that his uncle receives illegal aliens from a subject and his uncle recruits the guides to smuggle the groups into the United States. He admitted that he gets paid \$100.00 USD to deliver them to the intended destination. He divulged that on this occasion he intended to deliver the subjects to the "Palenque Gallo" sign near 23rd Street in Hidalgo, Texas. He also informed agents that the intended load vehicle driver was a subject known as "el Borrado." He stated that AGUILAR was in contact with him to coordinate the pick-up. MENDOSA stated he has smuggled aliens two times before. But claims he has successfully smuggled undocumented aliens only once, as a juvenile.

PRINCIPLE STATEMENT:

AGUILAR-Julian, Nazareth was advised of her Miranda Rights and declined to provide a sworn statement without an attorney present.

MATERIAL WITNESS STATEMENTS:

Material Witness #1

Antonio DE LA CRUZ-Victoriano was advised of his Miranda Rights and provided a sworn statement without the presence of an attorney.

DE LA CRUZ stated that he traveled from Puebla, Puebla, Mexico to Reynosa, Tamaulipas via bus. He indicated that a cousin made his smuggling arrangements with an unknown individual in Reynosa. The arrangements included him paying \$500 USD in Reynosa and he was to pay an additional \$2,000 USD upon arriving in Houston, Texas. DE LA CRUZ specified that he and the eleven other subjects entered the US illegally on April 6, 2015. DE LA CRUZ indicated they had two foot guides, a male and female. Both foot guides instructed them to follow, stay down and stay quiet. Both guides also told them if they saw Border Patrol to run from them. DE LA CRUZ described the male guide as wearing dark color pants and a brown shirt with wording on the back. DE LA CRUZ described the female guide as wearing blue jeans with a dark blue and pink shirt and using a cell phone.

DE LA CRUZ identified, MENDOSA-Larrea, Isaias, in a photo lineup as the male foot guide of the

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CONTINUATION:

group.

DE LA CRUZ identified, AGUILAR-Julian, Nazareth, in a photo lineup as the female foot guide of the group.

Material Witness #2 Statement

GARCIA-Manguia, Fidelina was advised of her Miranda Rights and provided a sworn statement without the presence of an attorney.

GARCIA began her sworn statement by saying that she was a Honduran National that traveled by bus from her hometown in Honduras to Reynosa, Tamaulipas, Mexico. She indicated that she paid \$17,000 Mexican Pesos to be smuggled to Houston, Texas. GARCIA stated she and six others were crossed by the male foot guide and entered the United States illegally a few minutes after midnight on April 6, 2015. GARCIA described the male guide as wearing jean pants and a faded red short sleeve shirt. GARCIA indicated that upon crossing that they encountered the female foot guide. GARCIA described the female guide as young girl wearing jeans and a black blouse. GARCIA observed the female guide grab the other foot guide aggressively by the shirt and tell him to follow her and that she was in charge. GARCIA also mentions that the female guide would make and receive calls but would always walk away from the group when she talked.

GARCIA identified, MENDOSA-Larrea, Isaias, in a photo lineup as the male foot guide of the group.

GARCIA identified, AGUILAR-Julian, Nazareth, in a photo lineup as the female foot guide of the group.